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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91223243
Party	Defendant Bella Collina Events LLC
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Submission	Motion to Extend
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Date	09/17/2015
Attachments	TTAB-Motion_to_Extend_Time_to_Answer.pdf(281550 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

DCS INVESTMENT HOLDINGS, LLC,)	Opposition No. 91223243
)	Serial No. 86362378
<i>Opposer,</i>)	
)	
v.)	<u>MOTION TO EXTEND TIME TO</u>
)	<u>ANSWER</u>
BELLA COLLINA EVENTS LLC,)	
)	
<i>Applicant.</i>)	
)	

Applicant Bella Collina Events, LLC (“BCE”), through the undersigned counsel, hereby submits this Motion to Extend Time to Answer pursuant to Fed. R. Civ. P. 6(b), made applicable to TTAB proceedings by 37 C.F.R. § 2.116(a), and T.B.M.P. §§ 310.03(c) and 509.

In support of its Motion, BCE shows the Board that good cause for this extension is shown as follows:

1. On August 11, 2015, DCS Investment Holdings, LLC (“DCS Investment”) filed its Notice of Opposition to BCE’s trademark application (Serial No. 86/362,378) for BELLA COLLINA EVENTS.
2. BCE’s deadline to file its Answer is Monday, September 21, 2015. The time for BCE to file its Answer has not yet expired and this is the first extension requested in this case.
3. On September 3, 2015, BCE filed its Motion to Suspend Proceedings, which is currently pending. A ruling in BCE’s favor on its Motion to Suspend would temporarily obviate the need for BCE to devote substantial time and expense to file an Answer to the Notice of Opposition.
4. As set forth more fully in BCE’s Motion to Suspend Proceedings, BCE is actively engaged in federal civil litigation pending in the United States District Court for the Middle District of

North Carolina, the outcome of which may permanently obviate the need for BCE to file its Answer.

5. This Motion is not necessitated by a lack of diligence or unreasonable delay by BCE.

6. BCE attempted to confer with counsel for DCS Investment regarding this stipulation on September 16, 2015, but did not receive a definitive response as to whether it would consent by the time of this filing on September 17, 2015.

For the foregoing reasons, good causes exists to extend the time in which BCE has to file its answer by thirty (30) days—through Tuesday, October 20, 2015—to allow the Board time to rule on BCE's Motion to Suspend Proceedings.

Respectfully submitted this 17th day of September, 2015

/s/ Kimberly M. Marston

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CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Motion to Extend Time to Answer has been served on the following by mailing said copy on September 17, 2015, via electronic mail and First Class Mail, postage prepaid:

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/s/ Kimberly M. Marston
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